

column 9, lines 1-28. Ando is completely silent as to what may or may not happen during translation to the left.

Claim 18 specifies that the direction of travel causes the displacement. There is no teaching or suggestion in Ando that direction of travel causes a displacement. The examiner has not addressed this particular limitation.

In paper 8, claims 3, 4, 11 and 12 were rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over Ando in view of U.S. Patent Number 6,495,812 (Wurm *et. al.*) and Japanese Publication JP 11-341219 (Takahashi). Applicant respectfully traverses. Claims 3 and 11 specify that pads that pivot. A combination of Ando, Wurm *et. al.*, and Takahashi does not teach or suggest pivoting pads.

Claims 4 and 12 specify that an optical head pivots around pads. A combination of Ando, Wurm *et. al.*, and Takahashi does not teach or suggest an optical head pivoting around pads. There is no teaching or suggestion in Takahashi that anything rotates around the pads. Takahashi expressly teaches away from allowing the distance between the optical head and the platen to vary with movement, stating: “. . . pressuring member 7 maintains the relative angle and the relative distance with the contact glass 1 . . .” (Quote is from English language Abstract). Wurm *et. al.* teaches pivoting using a motor and pushrod, but that does not teach or suggest rotating around pads because nothing in any of the cited art teaches or suggests rotating around pads.

This application is considered to be in condition for allowance and such action is earnestly solicited.

Respectfully submitted,

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